144 West Stadium Drive Stockton, Calif. 95204 June 29, 1998

CalFed: Bay-Delta Program
1416 - 9th St. - Suite 1155
Attention: Mr. Rick Breitenbach

JUL 0 2 1998

Subject: Public Comment (ending 1 July) on Bay-Delta Program

Dear Mr. Breitenbach,

The San Joaquin Delta is one of the most marvelous estuaries on the continent; there's an incredible diversity of wildlife and aquatic life - a cornucopia. But now, the fate of this fabulous Delta is in CalFed's hands.

The San Joaquin Delta has for some time been identified as an "impaired water body". It is one of the most degraded, polluted basins in the nation because the river systems in California have been used as a convenient sewer by agriculture, by municipalities, and by industry. Because the Delta is clearly out of compliance with the Clean Water Act, CalFed was created - since the California State Water Board (and its "teammates") was incapable of resolving the complex technical and political issues involved.

Under CalFed's stewardship, however, the Bay-Delta Program - which started out as an effort to restore the health of the Delta - has metamorphosed into an effort to ensure the security of southern San Joaquin Valley agriculture's water supplies and actually to increase the export of water south. The corporate farms in the southern San Joaquin Valley consume a massive 85% of the water shipped south. (The proportion of water that goes over the Tehachapis is only 14-15%). Yet that same thirsty southern San Joaquin Valley corporate agriculture only contributes about 3% to the California economy. Despite these incontrovertible facts, the current CalFed plan would perpetuate a system of inefficient use of subsidized water to grow marginal crops on marginal soils.

The real problem with southern San Joaquin Valley agriculture is that millions of acre feet are irrigating 1) marginal lands in the desert to grow subsidized crops of cotton and corn and rice and alfalfa, and 2) the selenium-laced soils of Westlands on the west side of the valley. And, of course, the selenium-laced soils of Westlands end up poisoning the Delta because the return waters are so high in selenium and salts.

None of CalFed's three alternative storage and conveyance plans (presented at the recent hearing in Stockton) have any effect whatsoever on the practice of inappropriate agriculture in the southern San Joaquin Valley. Nor do the three plans recognize the power of or promote the use of conservation to help solve California's water problems.

CalFed Needs To Look At Conservation:

Calfed needs to look not only on the supply side but on the demand side of water use. Calfed needs to look at conservation. That

means mandatory water-efficient appliances, mandatory water meters and other conservation strategies. Most important of all is the urgent need for MANDATORY RETIREMENT OF THESE MARGINAL LANDS that are literally poisoning the Delta. Furthermore, Calfed needs to look at far greater water releases from Friant dam. About 98% of the average upper-basin runoff of the San Joaquin river is currently diverted to inappropriate agriculture.

With Conservation, There's Enough Water For All:

The promise is that if California can become perhaps 15% more water efficient, then we don't have a water problem in California. There's enough water for the aquatic ecosystems, there's enough water for resasonable growth, there's enough water for appropriate agriculture.

CalFed is focusing on the Delta's "plumbing". But every major replumbing project in the Delta over the last five decades has made things worse, despite assurances to the contrary. All of the badly flawed EIRs describe benign impacts, or to fully mitigated impacts. And that's never been the case; they've all made the situation worse.

If CalFed is to fulfill its mandate "to restore the San Joaquin Delta to health", it must heed the angry voices and listen to the sound advice of the attendees of the Stockton hearing.

I am enclosing an article of an interview with Bill Jennings, "Calfed Process Will Destroy Delta Water Forever", from the July 1998 issue of Connections. I am also including a transcription of a KNBR radio interview (Summer 1990) with Marc Reisner, author of Cadillac Desert. Last, but not least, I would recommend that all members of Calfed read - and thoroughly digest the message of - the Reisner book.

Stanley G. Thomas

Enclosures: Morearty article, <u>Connections</u> (Jul '98)
Transcript, radio interview of Marc Reisner